

# EXHIBIT A

STATE OF MINNESOTA  
COUNTY OF HENNEPIN

DISTRICT COURT  
FOURTH JUDICIAL DISTRICT

Case Type: Personal Injury

Marcia Reiter,  
Plaintiff,

Court File No.:  
Judge:

vs.

**SUMMONS**

TMT Woodbury Apartments, Inc.,

Defendant.

---

**THIS SUMMONS IS DIRECTED TO: TMT Woodbury Apartments, Inc. C/O CT Corporations System Inc, its Registered Agent, 1010 Dale Street North, St. Paul, Minnesota, 55117-5603.**

**YOU ARE BEING SUED.** The Plaintiff has started a lawsuit against you. The Plaintiff's Complaint against you is attached to this Summons. Do not throw these papers away. They are official papers that affect your rights. You must respond to this lawsuit even though it may not yet be filed with the Court and there may be no Court file number on this Summons.

**YOU MUST REPLY WITHIN 20 DAYS TO PROTECT YOUR RIGHTS.** You must give or mail to the person who signed this Summons a **written response** called an Answer within 20 days of the date on which you received this Summons. You must send a copy of your Answer to the person who signed this Summons located at Halunen Law, 80 South 8<sup>th</sup> Street, IDS Center, Suite 1650, Minneapolis, MN 55402.

**YOU MUST RESPOND TO EACH CLAIM.** The Answer is your written response to the Plaintiff's Complaint. In your Answer, you must state whether you agree or disagree with each paragraph of the Complaint. If you believe the Plaintiff should not be given everything asked for in the Complaint, you must say so in your Answer.

**YOU WILL LOSE YOUR CASE IF YOU DO NOT SEND A WRITTEN RESPONSE TO THE COMPLAINT TO THE PERSON WHO SIGNED THIS SUMMONS.** If you do not Answer within 20 days, you will lose this case. You will not get to tell your side of the story, and the Court may decide against you and award the Plaintiff everything asked for in the Complaint. If you do not want to contest the claims stated in the Complaint, you do not need to respond. A Default Judgment can then be entered against you for the relief requested in the Complaint.

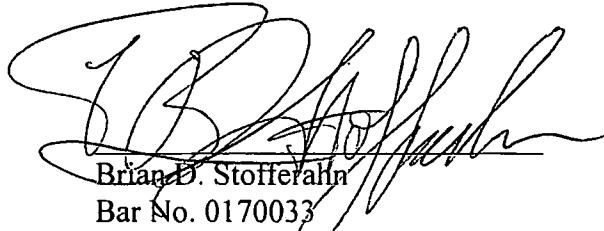
**LEGAL ASSISTANCE.** You may wish to get legal help from a lawyer. If you do not have a lawyer, the Court Administrator may have information about places where you can get legal assistance. **Even if you cannot get legal help, you must still provide a written Answer to protect your rights or you may lose the case.**

**ALTERNATIVE DISPUTE RESOLUTION.** The parties may agree to or be ordered to participate in an alternative dispute resolution process under Rule 114 of the Minnesota General Rules of Practice. You must still send your written response to the Complaint even if you expect to use alternative means of resolving this dispute.

Dated: 11/18/2020

Respectfully submitted,

**HALUNEN LAW**



Brian D. Stofferahn  
Bar No. 0170033  
1650 IDS Center  
80 South Eighth Street  
Minneapolis, MN 55402  
Telephone: (612) 605-4098  
Facsimile: (612) 605-4099  
[stofferahn@halunenlaw.com](mailto:stofferahn@halunenlaw.com)

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF HENNEPIN

FOURTH JUDICIAL DISTRICT

Case Type: Personal Injury

Marcia Reiter,

Court File No.:

Judge:

Plaintiff,

vs.

**COMPLAINT**

TMT Woodbury Apartments, Inc.,

Defendant.

---

Plaintiff, Marcia Reiter, for her Complaint against Defendant TMT Woodbury Apartments, Inc. states and alleges as follows:

I.

On March 12<sup>th</sup>, 2019, Plaintiff Marcia Reiter resided in her apartment located at 2234 Vining Drive, Unit M, in the City of Woodbury, County of Washington, State of Minnesota.

II.

Said apartment was within TMT Woodbury Apartments, Inc., a foreign corporation, with a registered agent, CT Corporations, Inc., located at 1010 Dale Street, St. Paul, Minnesota.

III.

TMT Woodbury Apartments, Inc. owned and controlled the common areas at and around Ms. Reiter's apartment, pursuant to common law and the lease agreement.

IV.

At that time, Ms. Reiter was walking her dog in a common area immediately in front of the apartment office. As she walked on the sidewalk, she fell on an area of water-covered ice sustaining an injury to her hip, leg, and other parts of her body.

V.

Defendant, TMT Woodbury Apartments, Inc., was negligent in the maintenance of the sidewalk. Defendant knew or should have known of the dangerous condition. Defendant failed to maintain the area as required. Defendant also failed to warn Plaintiff of the ice beneath the water.

VI.

As a direct result the Defendant's negligence, Plaintiff has sustained bodily injuries, past and future medical expenses, past and future pain and suffering.

**WHEREFORE**, Plaintiff Marcia Reiter prays for relief as follows:

1. For damages in the amount in excess of \$50,000.00;
2. For costs, disbursements, and prejudgment interest; and
3. Such other and further relief as the Court deems just and equitable.

Dated: 11/18/2020

Respectfully submitted,

**HALUNEN LAW**



Brian D. Stofferahn  
Bar No. 0170033  
1650 IDS Center  
80 South Eighth Street  
Minneapolis, MN 55402  
Telephone: (612) 605-4098  
Facsimile: (612) 605-4099  
[stofferahn@halunenlaw.com](mailto:stofferahn@halunenlaw.com)

ACKNOWLEDGMENT

The undersigned hereby acknowledges that costs, disbursements and reasonable attorney and witness fees may be awarded pursuant to Minn. Stat. § 549.211, subd. 1, to the party against whom the allegations in this pleading are asserted.



Brian D. Stofferahn (#170053)